

EISENBERG & SCHNELL LLP

ATTORNEYS AT LAW

HERBERT EISENBERG

LAURA S. SCHNELL

JULIAN R. BIRNBAUM
Of Counsel

February 26, 2018

BY ECF

Honorable Jesse M. Furman
United States District Judge
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: Rehal v. Weinstein, et al.
18-cv-674 (JMF)

Dear Judge Furman:

Together with the Genie Harrison Law Firm, APC, we represent the plaintiff Sandeep Rehal, in the above-referenced matter. We write to inform the Court that we are unable to amend the Complaint to allege the citizenship of the Weinstein Company LLC defendants as required by your Honor's January 29, 2018 Order. Although plaintiff has alleged the principal place of business and incorporation of the Weinstein corporate entities and takes the position that should be sufficient for diversity jurisdiction, *see Lincoln Benefit Life Co. v. AEI Life, LLC*, 800 F.3d 99, 111-113 (3d Cir. 2015), we understand the law in this Circuit is to the contrary, and will result in the dismissal of the Complaint by the Court for lack of subject matter jurisdiction.

Respectfully submitted,



Laura S. Schnell

cc: Lynn A. Kappelman, Esq. (via email LKappelman@seyfarth.com)
Gerald L. Maatman Jr., Esq. (via email gmaatman@seyfarth.com)
Genie Harrison, Esq. (ECF)
Mary E. Flynn, Esq. (ECF)
Aaron Michael Schue, Esq. (ECF)

THE WOOLWORTH BUILDING
233 BROADWAY, SUITE 2704
NEW YORK, NEW YORK 10279

PHONE 212.966.8900
FAX 212.966.2505
eisenbergschnell.com